



SURFACE TRANSPORTATION BOARD
Washington, DC 20423

Office of Economics, Environmental Analysis and Administration

HEO-451
107w
April 3, 2007

David Valenstein
Federal Railroad Administration
Mail Stop 20
1120 Vermont Avenue, N.W.
Washington, D.C. 20590

RE: STB Finance Docket No. 34836, Arizona Eastern Railway—Construction and Operation—In Graham County, Arizona.

Dear Mr. Valenstein:

As you know, the Surface Transportation Board's (Board) Section of Environmental Analysis (SEA) is in the process of conducting an environmental review in Finance Docket No. 34836, Arizona Eastern Railway (AZER) – Construction and Operation – In Graham County, Arizona. The proposed rail line would connect Phelps's Dodge proposed San Juan mining operation with an existing 113.5 mile AZER line that operates between Miami and Bowie, AZ. An Environmental Assessment (EA) is being prepared by SEA for this project pursuant to the National Environmental Policy Act (NEPA) and other Federal laws including the National Historic Preservation Act (NHPA). As the lead Federal agency charged with complying with Section 106 of NHPA, we are seeking your review and comment on the enclosed archaeological survey. Below, I provide some background on the survey and set forth directions on how to submit any comments that you may have.

The Area of Potential Effect (APE), as depicted in the survey, consists of a 300-foot-wide corridor along Alternative A and a 500-foot-wide corridor along Alternative B. Alternative A is no longer under consideration. Rather, the two alternatives being considered in this EA are: The Proposed Action Alternative (shown as Alternative B in the enclosed survey) and the No-Action Alternative. The project area is located on Federal (Bureau of Land Management), state and private lands.

SEA performed an intensive archaeological survey between May and August 2006. The survey resulted in the identification 18 isolated occurrences (IOs) of artifacts or cultural features and seven new archaeological sites. The APEs also cross three previously recorded linear sites including the Arizona Eastern Railroad, US 666/191 and

Union Canal. The National Register of Historic Places (NRHP) eligibility of four sites could not be determined from surface evaluations alone, therefore we will be conducting eligibility testing once construction plans have been completed. Although we are still in the process of making final National Register determinations for the historic properties, the proposed action would likely result in adverse effects, including direct impacts, to some National Register eligible sites.

Enclosed for your review and comment is the draft document, *A Class III Cultural Resources Inventory of the Arizona Eastern Railroad Extension of Service Right-of-way near Solomonville, Graham County, Arizona*, completed by WestLand Resources, Inc. (consultants for the railroad) and peer reviewed by William Self Associates, Inc. (WSA) of Tucson, AZ on behalf of SEA. Please inform us if you have questions and/or comments about the enclosed report. We would appreciate receiving your response within 45 days after delivery of this letter.

Please send your comments to:

John C. Ravesloot, Ph.D.
WSA, Inc.
2424 E. Broadway, Blvd., Suite 100
Tucson, Arizona 85719

If you have any questions regarding this letter or require further information, please do not hesitate to contact John Ravesloot at 520-624-0101 or Diana Wood, SEA Project Manager, at 202-245-0302 (woodd@stb.dot.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Victoria Rutson". The signature is fluid and cursive, with the first name "Victoria" and last name "Rutson" clearly distinguishable.

Victoria Rutson
Chief
Section of Environmental Analysis

Enclosure

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